

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

CIVIL ACTION NO. 2:23-CV-00352

JURY TRIAL DEMANDED

AGREED MOTION FOR EXTENSION OF TIME TO FILE E-DISCOVERY ORDER

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group, Inc. (collectively, “Verizon”) hereby stipulate and agree, with the Court’s permission, to an extension of time for the Parties to file a Proposed E-Discovery Order from **December 1, 2023** to on or before **December 5, 2023**.

The Parties do not file this Agreed Motion for purposes of delay, but rather to allow the Parties adequate time to address their remaining disputes and the deadlines, obligations, and protections afforded by this proposed order.

DATED: December 1, 2023

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CERTIFICATE OF SERVICE

I hereby certify that, on December 1, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez

CERTIFICATE OF CONFERENCE

I hereby certify that, on December 1, 2023, counsel for Verizon conferred with counsel for Plaintiff Headwater Research LLC and that this Agreed Motion is unopposed.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez